



TOKAI CARBON CB
Building a Future of Technology and Trust

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Fort Worth, TX 76102

Long B. Nguyen
Director, Process Safety & Environmental Programs

March 14, 2022

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
1200 Pennsylvania Ave. NW Washington,
D.C. 20460

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

Director of Litigation
Litigation Division
MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Division Chief
Environmental Protection Division
MC-066
Office of the Attorney General of Texas
P.O. Box 12548
Austin, TX 78711-2548

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

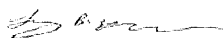
Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Borger Plant Wet Gas Acid ("WSA") scrubber had elevated SO₂ and NO_x emissions relative to their most stringent 7-day limits, for the period of January 17th through March 10th. (Please see attached CEMS data). For the period of February 1 – February 8, there were some anomalous high SO₂ CEMS readings and these readings biased the 7-day averages for this period. We believe that these anomalous SO₂ CEMS readings were not valid and we are working with the vendor to investigate this. We are continuing to work with the WSA scrubber to optimize its operations. However, we would like to implement the alternative limits that are outlined in Provision 18 (Option B and Appendix E) and Provision 27.b.ii. and have been in discussions with the DOJ about the potential to do so in light of the WSA delays and the continuing work to optimize the scrubber operations. These provisions allow for the collection of emissions data for a certain period, and alternative limits can be set based on the

data collected.

In addition, the plant also had a malfunction event when an expansion joint in the ductwork leading to the WSA scrubber failed. The facility had to use Unit 4 flare, starting on March 5th through March 7th. This flare was used for approximately for 52 hours while this expansion joint was being fixed.

An affirmation defense will be asserted for this malfunction event in the next semi-annual compliance report per Provision 77 of the Consent Decree. Please let me know if you need additional information.

Sincerely,

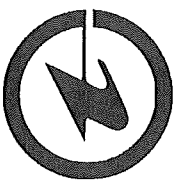
A handwritten signature in black ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen

NOx 7-Day ppmvdc Excess Emission Report

Boiler (EPN-119)

From: 01/01/2022 00:00 To: 03/11/2022 09:55 Facility Name: Tokai Borger Facility
Generated: 03/11/2022 07:37 Location: Borger, TX



Tag Name: U1_NOX_7D_ppmvdc_1D

Total Operating Time: 67.00 Day(s)

Non-Operating Time: 3.00 Day(s) Report Time: 70.00 Day(s)

No Exclusions Allowed

Inc No	Start Time	End Time	Duration in Day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	01/17/22 00:00	01/22/22 23:59	6	59	54	64		
2	03/10/22 00:00	03/10/22 23:59	1	55	54	55		

Total Operating Time:

Total Duration (Online only):

Time in exceedance as a percentage of operating time:

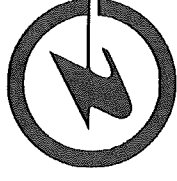
Time in compliance as a percentage of operating time:

67.00 Day(s)
7.00 Day(s)
10.45 %
89.55 %

S02 7-Day ppmvdc Excess Emission Report

Boiler (EPN-119)

From: 02/01/2022 00:00 To: 03/10/2022 06:57 Facility Name: Tokai Borger Facility
Generated: 03/11/2022 07:36 Location: Borger, TX



Tag Name: U1_S02_7D_Ppmvdc_1D

Total Operating Time: 36.00 Day(s)

Non-Operating Time: 2.00 Day(s) Report Time: 38.00 Day(s)

No Exclusions Allowed

Inc No	Start Time	End Time	Duration in day(s)	Average	Limit	Maximum	Reason Code	Action Code
1	02/01/22 00:00	02/08/22 23:59	8	274	120	387		
2	02/14/22 00:00	02/20/22 23:59	7	158	120	179		
3	02/26/22 00:00	03/03/22 23:59	6	141	120	146		

Total Operating Time:

Total Duration (Online only):

Time in exceedance as a percentage of operating time:

Time in compliance as a percentage of operating time:

36.00 Day(s)
21.00 Day(s)
58.33 %
41.67 %